

brownrudnick

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August 2, 2024

Honorable Dennis Montali
United States Bankruptcy Court
Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, California 94102

**RE: *In re PG&E Corporation and Pacific Gas and Electric Co.,*
Case No. 19-30088 (DM) (Jointly Administered)
Related to Hearing on Docket No. 14491—Trustee Determinations to be Submitted**

Dear Judge Montali:

To facilitate this Court's directive [Jul. 30, 2024 Hr'g Tr. at 29:10-17] during the July 30, 2024 hearing on the *Motion to Stay Proceedings Re Disputed Claims Under the Fire Victim Trust Agreement* [Docket No. 14491], as counsel to Cathy Yanni, in her capacity as the Trustee (the "Trustee") of the Fire Victim Trust (the "Trust"), we are filing under seal contemporaneously herewith the Appeals Neutral and Trustee Determinations for each of the Movants (collectively, including the exhibits thereto, the "Trustee Determinations"). While we understand that counsel for Movants plans to file the Trustee Determinations along with a multiple other documents, in the interest of judicial economy, we are providing to the Court under seal those documents (in a single PDF) that the Court specifically identified during Hearing – the relevant Appeals Neutral and Trustee Determinations. *See* Jul. 30, 2024 Hr'g Tr. at 31:22-24.

Given the Court's clear directive to file the Trustee Determinations under seal, we are not filing a separate motion to seal at this time but are prepared to do so should the Court so direct. In accordance with Rule 1001-2(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California and the *Procedures for Filing Redacted or Sealed Confidential or Highly Sensitive Documents* adopted by the United States Bankruptcy Court for the Northern District of California, we are submitting contemporaneously herewith the Declaration of Cathy Yanni to explain the redactions to the exhibits within the Trustee Determinations as provided to Movants counsel in accordance with regular Trust policy. Unredacted copies of the exhibits are being provided to the Court and to Movants counsel separately.



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Please let us know if the Court has any questions.

Respectfully submitted,

BROWN RUDNICK LLP

A blue ink signature of the name David J. Molton.

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